

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

ALEX GOLDFARB,

Plaintiff,

v.

CHANNEL ONE RUSSIA and  
RT AMERICA,

Defendants.

Case No. 1:18-cv-08128-DAB

ORAL ARGUMENT REQUESTED

**RT AMERICA, A.K.A. ANO TV NOVOSTI'S  
NOTICE OF MOTION TO DISMISS PLAINTIFF'S COMPLAINT  
FOR LACK OF PERSONAL JURISDICTION AND FAILURE TO STATE A CLAIM**

PLEASE TAKE NOTICE that, pursuant to Rules 7(b), 12(b)(2), and 12(b)(6) of the Federal Rules of Civil Procedure and Local Civil Rule 7.1, Defendant RT America, a.k.a. ANO TV Novosti, hereby appears for the purpose of moving the Court, before the Honorable Deborah A. Batts, United States District Judge, at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, 10007, at a date and time to be determined by the Court, for an order dismissing all of the claims asserted against RT America, a.k.a. ANO TV Novosti, for want of personal jurisdiction and for failure to state a claim. A memorandum of law in support of this Motion is filed herewith.

Dated: February 11, 2019  
Washington, DC

Respectfully submitted,

**WHITE & CASE**

/s/ Nicole Erb

Nicole Erb

Matthew S. Leddicotte (*pro hac vice* admission  
pending)

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*Counsel for Defendant RT America, a.k.a. ANO  
TV Novosti*

**CERTIFICATE OF SERVICE**

I hereby certify that, on February 11, 2019, I caused an electronic copy of the foregoing Notice of Motion to be served electronically by the Court's Electronic Case Filing (ECF) System.

I also hereby certify that, on February 11, 2019, I caused a copy the foregoing Notice of Motion to be served by U.S. mail as follows:

Vladimir Lenskiy  
108 Perry Street  
Unit 2A  
New York, New York 10014

Channel One Russia  
250 West 57th Street  
Suite 429  
New York, New York 10107

Dated: February 11, 2019

/s/ Nicole Erb  
Nicole Erb